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*Counsel for Plaintiff*  
**VIRAL DRM LLC**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

VIRAL DRM LLC,  
  
Plaintiff,  
  
v.  
  
UONG SY THANH,  
  
Defendant.

CASE NO.: 3:24-cv-00731-JSC

**DECLARATION OF MATTHEW L. ROLLIN  
IN SUPPORT OF PLAINTIFF’S MOTION  
FOR DEFAULT JUDGMENT AGAINST  
UONG SY THANH**

I, Matthew L. Rollin, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff VIRAL DRM LLC (“Viral DRM”) in the above-captioned matter. I provide this Declaration in support of Viral DRM’s Motion for Entry of a Final Default Judgment Against Defendant UONG SY THANH (“Thanh” or “Defendant”). I have personal knowledge of the facts stated herein, and if called as a witness, I could and would testify competently to the matters set forth herein.
2. Thanh has refused to answer, show up or otherwise respond in this case.
3. Injunctive relief is warranted because Thanh has refused to respond to Counsel or the Court, and due to its lack of a response, there is a chance it could infringe again in the future.

1           4.       For purposes of setting the post-judgment interest rate under 28 U.S.C. § 1961, the  
2 average 1-year constant maturity Treasury yield through August 23, 2024, was 4.36 percent.  
3 Attached as **Exhibit 1** is a true and correct copy of a table of current federal interest rates, which I  
4 obtained from the Federal Reserve Board’s website at <https://www.federalreserve.gov/releases/h15/>  
5 (printout of “Treasury Constant Maturities,” displaying “1-year Treasury constant maturity”). Also  
6 attached at **Exhibit 2** is an explanation of how to obtain the information, from  
7 <http://www.uscourts.gov/services-forms/fees/post-judgement-interest-rate>

8           5.       My office caused a copy of Viral DRM’s Motion to be emailed to Thanh on August  
9 27, 2024. Viral DRM has served Thanh with its requested damage amount with its counsel’s service  
10 of this motion on Thanh.

11  
12           I declare under penalty of perjury under the laws of the United States of America that the  
13 foregoing is true and correct.

14  
15 Executed on August 27, 2024

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17                   /s/ Matthew L. Rollin  
18 Matthew L. Rollin  
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